

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

VALERIE KAY AGUON (2),

Defendant.

Case No. 2:24-CR-0035-TOR-2

STIPULATED DISCOVERY
PROTECTIVE ORDER

BEFORE THE COURT IS the Motion for Protective Order Stipulated Motion for
Discovery Protective Order. ECF No. 81. The Court having considered the motion, and
being fully advised in this matter, hereby grants the motion and enters the following
Protective Order:

IT IS HEREBY ORDERED that:

1. This order governs all discovery material in any format (written or electronic),
and information contained therein, that is produced by the United States in discovery in
the above captioned case.

2. The United States will make available copies of discovery materials, including
those filed under seal, to defense counsel to comply with the United States' discovery

1 obligations. Possession of copies of the discovery materials is limited to the attorneys of
2 record, and investigators, paralegals, law clerks, experts, and assistants for the attorneys
3 of record (hereinafter collectively referred to as members of the defense team).
4

5 3. The attorneys of record and members of the defense team may display and
6 review the discovery materials with Defendant AGUON (2). The attorneys of record and
7 members of the defense team acknowledge that providing copies of the discovery
8 materials to Defendant AGUON (2) or other persons is prohibited and agree not to
9 duplicate or provide copies of discovery materials to Defendant AGUON (2) or other
10 persons.
11
12

13 4. Nothing in this order should be construed as imposing any discovery
14 obligations on the United States or Defendant AGUON (2) that are different from those
15 imposed by case law or Federal Rule of Criminal Procedure 16.
16

17 5. Any discovery material, or personal identifying information contained therein,
18 that is filed with the Court in connection with pretrial motions, trial, sentencing, or other
19 matters before this Court, shall be redacted or filed under seal and shall remain sealed
20 until otherwise ordered by this Court. This does not entitle either party to seal their
21 filings as a matter of course. The parties must comply in all respects with the relevant
22 local and federal rules of criminal procedure pertaining to the sealing of court
23 documents.
24
25

26 6. The provisions of this order shall not terminate at the conclusion of this
27 prosecution.
28

1 7. Any violation of any term or condition of this order by Defendant AGUON (2),
2 Defendant AGUON (2)'s attorney(s) of record, any member of the defense team, or any
3 attorney for the United States Attorney's Office for the Eastern District of Washington,
4 may be held in contempt of court.
5

6 8. Any discovery materials provided pursuant to this order, including all copies,
7 shall be returned to the United States Attorney's Office for the Eastern District of
8 Washington within ten days after the completion of the case before the Court or, if an
9 appeal is taken, within ten days of the completion of the case in the United States Court
10 of Appeals for the Ninth Circuit or Supreme Court of the United States.
11
12

13 9. If Defendant AGUON (2) violates any term or condition of this order, the
14 United States has reserved its right to seek a sentencing enhancement for obstruction of
15 justice, or to file any criminal charges relating to the Defendant AGUON (2)'s violation.
16

17 **IT IS SO ORDERED.** The Clerk shall enter this Order and furnish copies to
18 counsel.
19

20 DATED January 3, 2025.
21



A handwritten signature in blue ink that reads "Thomas O. Rice".

THOMAS O. RICE
United States District Judge